



defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Two

Violation: 18 U.S.C. § 1956(h)
(Conspiracy to Commit Money
Laundering in violation of 18 U.S.C.
§§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i))

That from sometime in or about January 2017, and continuously thereafter up to and including May 12, 2021,



Kennia Emperatriz Goodman-Largaespada

defendants, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit:

1. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce that involved the proceeds of a specified unlawful activity, that is,

Conspiracy to Possess with the Intent to Distribute a Controlled Substance, as described in Count One of this Indictment, with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i);

2. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce that involved the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with Intent to Distribute a Controlled Substance, as described in Count One of this Indictment, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i);

All in violation of 18 U.S.C. § 1956(h).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

A [REDACTED]

[REDACTED]
[REDACTED]
\$6,188 in U.S. currency seized from [REDACTED]; and

\$17,200 in U.S. currency seized from [REDACTED].

A TRUE BILL

GRAND JURY FOREPERSON

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

HEATHER RATTAN
Assistant United States Attorney

Date

Case 4:21-cr-00126-SDJ-KPJ Document 22 Filed 05/12/21 Page 5 of 6 PageID #: 77

UNITED STATES OF AMERICA

[illegible]

SEALED

V.

No. 4:21-CR-
Judge

KENNIA EMPERATRIZ GOODMAN-
LARGAESPADA (3)

Count One

Violation: 21 U.S.C. § 846

Penalty: If 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

Count Two

Violation: 18 U.S.C. § 1956(h) in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i)

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years.

Special Assessment: \$100.00